



February 27, 2009
Via ECFS Transmission

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Marlene H. Dortch, Commission Secretary
Office of the Secretary
Federal Communications Commission
445 – 12th Street, SW – Suite TW-A325
Washington, D.C. 20554

RE: EB Docket No. 06-36
Amended 2008 CPNI Certification Filing for NetCarrier Telecom

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Public Notice of January 7, 2009, and pursuant to 47 C.F.R. § 64.2009(e), NetCarrier Telecom hereby files its amended Certification of Customer Proprietary Network information (CPNI) for the year 2008 and supporting Statement. This amended filing replaces the Certificate and Statement originally submitted on February 25, 2009 in the filing with confirmation number 2009225556230.

As directed by the Public Notice, please include this amended Certification in EB Docket No. 06-36.

Please contact me at 407-740-3031 or sthomas@tminc.com if you have any questions about this filing.

Sincerely,

Sharon Thomas
Consultant to NetCarrier Telecom

ST/im.

Enclosure

Copy: Enforcement Bureau (*provided via ECFS website*)
Best Copy and Printing (*FCC@BCPIWEB.COM*)
C. Gerczak, NetCarrier
TMS: FCX0901A
File: NetCarrier – FCC Certs / Orders

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Name of company covered by this certification: NetCarrier Telecom

Form 499 Filer ID: 822608

Name of signatory: Barry Bella

Title of signatory: Executive Vice President Marketing

I, Barry Bella, certify that I am an officer of the NetCarrier Telecom, and acting as an agent of the company, I have personal knowledge of NetCarrier Telecom's operating procedures as they relate to CPNI and the Rules and Regulations of the Federal Communications Commission regarding CPNI.

I hereby certify that to the best of my knowledge, information and belief, NetCarrier Telecom's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.

Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Barry Bella, Executive Vice President Marketing

2/27/09

Date

Exhibit A

Statement of CPNI Procedures and Compliance

NetCarrier Telecom, LLC

Statement of CPNI Procedures and Compliance

NetCarrier Telecom ("NetCarrier" or "the Company") notifies its customers of their right to restrict use of, disclosure, and access to their CPNI, prior to asking for approval to use CPNI for marketing purposes. Customer approval is obtained in accordance with the applicable rules set forth in 47 CFR Subpart U. The Company has an employee training program and supervisory review process in place to ensure compliance with the CPNI rules. Any requests for CPNI for the purpose of outbound marketing campaigns are subject to supervisory approval.

NetCarrier establishes and maintains records establishing proof that approval was obtained and has a system that indicates the status of the customer's CPNI approval.

The Company has a formal process in place to certify the CPNI protection policies instituted by its vendors, service bureaus and wholesale carriers.

As set forth below, NetCarrier has processes and procedures in place to safeguard its customers' CPNI, including call detail information, from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. The Company trains its employees regarding its procedures for protecting CPNI on an ongoing basis and monitors the interactions of its employees with customers to ensure that procedures are being followed.

NetCarrier has instituted authentication procedures to safeguard the disclosure of call detail over the telephone. Its authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. All customers are required to establish a password without the use of readily available biographical information or account information if they want to receive call detail over the telephone. If the appropriate password is not provided, will either call the customer back at the telephone number of record to provide the requested information or send the information to the customer's address of record.

For online account access, NetCarrier has established authentication and password procedures that are in compliance with the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information.

Company has instituted procedures to notify customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account or address of record is created or changed without revealing the changed information or sending the notification to the new account information.

NetCarrier does not have any retail locations and therefore does not disclose CPNI in-store.

The Company has procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that the affected customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

The Company has not had any breaches of its customers' CPNI during the past year, but does have processes in place to ensure that it maintains electronic records of any breaches that are discovered and of notifications made to the USSS and the FBI, as well as to customers.

NetCarrier has not developed any information with respect to the processes pretexters are using to attempt to access CPNI, but does take steps to protect CPNI from pretexters as described in this Statement.